

# **EXHIBIT 1**

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

FEMHEALTH USA, INC., d/b/a  
CARAFEM,

Plaintiff,

v.

RICKEY NELSON WILLIAMS, JR.;  
BEVELYN Z. WILLIAMS, JR.;  
EDMEE CHAVANNES; AT THE WELL  
MINISTRIES; OPERATION SAVE  
AMERICA; JASON STORMS;  
CHESTER GALLAGHER; MATTHEW  
BROCK; COLEMAN BOYD; FRANK  
LINAM; BRENT BUCKLEY; and AJ  
HURLEY;

Defendants.

Civil Action No. 3:22-cv-00565  
JUDGE CAMPBELL

SECOND DECLARATION OF [REDACTED]

I, [REDACTED], declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.

2. At all times relevant hereto, I have served as [REDACTED] for carafem located in Mount Juliet, Tennessee.

3. On July 26 and 28, when carafem had to go into lockdown, approximately three (3) patients had their visits interrupted due to the actions of Defendants when they crossed onto the private property and occupied the front door of the clinic, and came into the building and shouted in front of the clinic doors. During this same time, approximately two (2) patients had their visits delayed, and approximately (3) patients rescheduled, cancelled, or did not show for their visits. I am aware of at least one patient who was afraid to enter our clinic on July 26,

2022, when OSA members were surrounding the door, and she waited for someone to escort her from an office down the hall to our clinic because she was worried for her safety.

4. On July 26 and 28, OSA members used a microphone or bullhorn to threaten carafem staff and patients. They called us murderers. They played loud sounds of crying babies directed at the clinic windows. These sounds were audible in the offices. I had patients who were visibly upset and obviously frustrated by the noise. I had to repeat myself to patients several times because patients were having trouble hearing me over the noise.

5. Carafem has had experience with OSA in the recent past. In March 2021, dozens of OSA members, led by Chet Gallagher, entered the building and blocked the door to carafem. They chanted and shouted. Patients could not get into the building, and staff were trapped inside. there was no way we were going to get out of the facility that day given the blockade. In total, approximately forty (40) client visits were interrupted throughout the day. I was [REDACTED] [REDACTED] I felt very afraid for my safety that day. The Mount Juliet police arrested about a dozen OSA members and their children that day because they refused to leave the building.

6. We also stopped taking walk-ins the week of July 25, 2022, because of the past occupation of carafem's office by OSA, and our fear that OSA members would try to enter carafem by claiming to need care even when they did not based on their doing so in the past. Since Defendants' actions on July 26 and 28, we have not resumed taking walk-in appointments. Since July 28, one OSA member, Bo Linam, has appeared on the sidewalk outside the clinic and attempted to keep people from their visits. Before this, we had approximately five (5) people walk-in seeking services each week. Defendants' actions have prevented us from providing walk-in care.

7. Because of our past experiences with OSA, I felt intimidated and threatened when the OSA members approached the building door on July 26, 2022. I continue to feel scared that they will come back to carafem even though Tennessee's abortion ban has been put in place. Though carafem is prohibited by law from providing abortion care in Tennessee, our clinic will remain open to provide patients with other reproductive care services, including birth control, pregnancy testing and dating, and testing for sexually transmitted infections.

I provide the foregoing Declaration pursuant to 28 U.S.C. § 1746 and penalty of perjury.

Dated: August 31, 2022

